

JAN 16 2019

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF NORTH CAROLINA
ASHEVILLE DIVISION

US DISTRICT COURT
WESTERN DISTRICT OF NC

UNITED STATES OF AMERICA

v.

WILLIAM RICHARD HILLIARD, JR.

DOCKET NO. 1:19CR3-MR-WCM

BILL OF INDICTMENT

Violations:

18 U.S.C. § 2251(a)

18 U.S.C. § 2252A(a)(1)

18 U.S.C. § 2252A(a)(2)(A)

18 U.S.C. § 2252A(a)(5)(B)

18 U.S.C. § 2423(a)

18 U.S.C. § 2423(b)

THE GRAND JURY CHARGES:

The production of child pornography of Child Victim 3 at Lake Wylie, South Carolina on or about September 13, 2011, that HILLIARD transported back to the Western District of North Carolina.

COUNT ONE

On or about September 13, 2011, in Gaston County, within the Western District of North Carolina and elsewhere,

WILLIAM RICHARD HILLIARD, JR.

did employ, use, persuade, induce, entice, and coerce Child Victim 3 to engage in sexually explicit conduct, for the purpose of producing a visual depiction of such conduct, which visual depiction was produced using materials that had been mailed, shipped, and transported in interstate and foreign commerce, and WILLIAM

RICHARD HILLIARD, JR. knew such visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce, and knew and had reason to know that such visual depiction would be, and later was, transported by him in interstate commerce into the Western District of North Carolina, and did attempt to do so.

All in violation of Title 18, United States Code, Section 2251(a).

The transportation of child pornography produced at Lake Wylie, South Carolina, of Child Victim 3, on or about September 13, 2011, back to the Western District of North Carolina.

COUNT TWO

On or about September 13, 2011, in Gaston County, within the Western District of North Carolina and elsewhere,

WILLIAM RICHARD HILLIARD, JR.

knowingly transported and attempted to transport child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), using any means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce by any means, including by computer.

All in violation of Title 18, United States Code, Section 2252A(a)(1).

The transportation of Child Victim 3 from the Western District of North Carolina to Alabama to engage in sexual activity with her and to produce child pornography of her on or about December 8, 2011.

COUNT THREE

On or about December 8, 2011, in Gaston County, within the Western District of North Carolina and elsewhere,

WILLIAM RICHARD HILLIARD, JR.

did knowingly transport, and did attempt to transport, Child Victim 3, an individual who had not attained the age of 18 years in interstate commerce with the intent that Child Victim 3 engage in any sexual activity for which any person could be charged with a criminal offense.

All in violation of Title 18, United States Code, Section 2423(a).

*The Defendant's travel from the Western District of North Carolina to Alabama to
engage in illicit sexual conduct*

with Child Victim 3, on or about December 8, 2011.

COUNT FOUR

On or about December 8, 2011, in Gaston County, within the Western District
of North Carolina and elsewhere,

WILLIAM RICHARD HILLIARD, JR.

did knowingly travel and did attempt to travel in interstate commerce for the purpose
of engaging in any illicit sexual conduct, as defined in Title 18, United States Code,
Section 2423(f), with another person.

All in violation of Title 18, United States Code, Section 2423(b).

The production of child pornography of Child Victim 3 in an Alabama Hotel that HILLIARD transported back to the Western District of North Carolina (the shower video.)

COUNT FIVE

On or about December 10, 2011, in Gaston County, within the Western District of North Carolina and elsewhere,

WILLIAM RICHARD HILLIARD, JR.

did employ, use, persuade, induce, entice, and coerce Child Victim 3 to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was produced using materials that had been mailed, shipped, and transported in interstate and foreign commerce, and **WILLIAM RICHARD HILLIARD, JR.** knew such visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce, and knew and had reason to know that such visual depiction would be, and later was, transported by him in interstate commerce into the Western District of North Carolina, and did attempt to do so.

All in violation of Title 18, United States Code, Section 2251(a).

The production of child pornography of Child Victim 3 in an Alabama Hotel that HILLIARD transported back to the Western District of North Carolina (the oral sex video).

COUNT SIX

On or about December 10, 2011, in Gaston County, within the Western District of North Carolina and elsewhere,

WILLIAM RICHARD HILLIARD, JR.

did employ, use, persuade, induce, entice, and coerce Child Victim 3 to engage in sexually explicit conduct, for the purpose of producing a visual depiction of such conduct, which visual depiction was produced using materials that had been mailed, shipped, and transported in interstate and foreign commerce, and **WILLIAM RICHARD HILLIARD, JR.** knew such visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce, and knew and had reason to know that such visual depiction would be, and later was, transported by him in interstate commerce into the Western District of North Carolina, and did attempt to do so.

All in violation of Title 18, United States Code, Section 2251(a).

*The transportation of the child pornography produced in Alabama back to the
Western District of North Carolina.*

COUNT SEVEN

On or about December 11, 2011, in Gaston County, within the Western
District of North Carolina and elsewhere,

WILLIAM RICHARD HILLIARD, JR.

knowingly transported and attempted to transport child pornography, as defined in
Title 18, United States Code, Section 2256(8)(A), using any means and facility of
interstate and foreign commerce, and in and affecting interstate and foreign
commerce by any means, including by computer.

All in violation of Title 18, United States Code, Section 2252A(a)(1).

The Defendant's travel from the Western District of North Carolina to Lake Wylie, South Carolina, to produce child pornography of Child Victim 3 and Child Victim

4 on or about May 4, 2012.

COUNT EIGHT

On or about May 4, 2012, in Gaston County, within the Western District of North Carolina and elsewhere,

WILLIAM RICHARD HILLIARD, JR

did knowingly travel and did attempt to travel in interstate commerce for the purpose of engaging in any illicit sexual conduct, as defined in Title 18, United States Code, Section 2423(f), with another person.

All in violation of Title 18, United States Code, Section 2423(b).

*The production of child pornography of Child Victim 3 on or about May 4, 2012,
at Lake Wylie that HILLIARD transported back to
the Western District of North Carolina.*

COUNT NINE

On or about May 4, 2012, in Gaston County, within the Western District of North Carolina and elsewhere,

WILLIAM RICHARD HILLIARD, JR.

did employ, use, persuade, induce, entice, and coerce Child Victim 3 to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was produced using materials that had been mailed, shipped, and transported in interstate and foreign commerce, and **WILLIAM RICHARD HILLIARD, JR.** knew such visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce, and knew and had reason to know that such visual depiction would be, and later was, transported by him in interstate commerce into the Western District of North Carolina, and did attempt to do so.

All in violation of Title 18, United States Code, Section 2251(a).

*The production of child pornography of Child Victim 4 on or about May 4, 2012,
at Lake Wylie, South Carolina that HILLIARD transported back to
the Western District of North Carolina.*

COUNT TEN

On or about May 4, 2012, in Gaston County, within the Western District of North Carolina and elsewhere,

WILLIAM RICHARD HILLIARD, JR.

did employ, use, persuade, induce, entice, and coerce Child Victim 4 to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was produced using materials that had been mailed, shipped, and transported in interstate and foreign commerce, and **WILLIAM RICHARD HILLIARD, JR.** knew such visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce, and knew and had reason to know that such visual depiction would be, and later was, transported by him in interstate commerce into the Western District of North Carolina, and did attempt to do so.

All in violation of Title 18, United States Code, Section 2251(a).

*The transportation of child pornography produced in Lake Wylie, South Carolina
of Child Victims 3 and 4, on or about May 4, 2012, back to
the Western District of North Carolina.*

COUNT ELEVEN

On or about May 4, 2012, in Gaston County, within the Western District of
North Carolina and elsewhere,

WILLIAM RICHARD HILLIARD, JR.

knowingly transported and attempted to transport child pornography, as defined in
Title 18, United States Code, Section 2256(8)(A), using any means and facility of
interstate and foreign commerce, and in and affecting interstate and foreign
commerce by any means, including by computer.

All in violation of Title 18, United States Code, Section 2252A(a)(1).

The production of child pornography of Child Victim 6 on or about August 17, 2012, at Lake Wylie, South Carolina that HILLIARD transported back to the Western District of North Carolina.

COUNT TWELVE

On or about August 17, 2012, in Gaston County, within the Western District of North Carolina and elsewhere,

WILLIAM RICHARD HILLIARD, JR.

did employ, use, persuade, induce, entice, and coerce Child Victim 6 to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was produced using materials that had been mailed, shipped, and transported in interstate and foreign commerce, and **WILLIAM RICHARD HILLIARD, JR.** knew such visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce, and knew and had reason to know that such visual depiction would be, and later was, transported by him in interstate commerce into the Western District of North Carolina, and did attempt to do so.

All in violation of Title 18, United States Code, Section 2251(a).

*The transportation of child pornography produced at Lake Wylie, South Carolina
of Child Victim 6, on or about August 17, 2012, back to
the Western District of North Carolina.*

COUNT THIRTEEN

On or about August 17, 2012, in Gaston County, within the Western District
of North Carolina and elsewhere,

WILLIAM RICHARD HILLIARD, JR.

knowingly transported and attempted to transport child pornography, as defined in
Title 18, United States Code, Section 2256(8)(A), using any means and facility of
interstate and foreign commerce, and in and affecting interstate and foreign
commerce by any means, including by computer.

All in violation of Title 18, United States Code, Section 2252A(a)(1).

The defendant's travel from the Western District of North Carolina to Myrtle Beach, South Carolina to produce child pornography of Child Victim 5 on or about June 23, 2016.

COUNT FOURTEEN

On or about June 23, 2016, in Cleveland County, within the Western District of North Carolina and elsewhere,

WILLIAM RICHARD HILLIARD, JR.

did knowingly travel and did attempt to travel in interstate commerce for the purpose of engaging in any illicit sexual conduct, as defined in Title 18, United States Code, Section 2423(f), with another person.

All in violation of Title 18, United States Code, Section 2423(b).

*The production of child pornography of Child Victim 5 on or about June 23, 2016,
at Myrtle Beach, South Carolina that HILLIARD transported back to
the Western District of North Carolina.*

COUNT FIFTEEN

On or about June 23, 2016, in Cleveland County, within the Western District of North Carolina and elsewhere,

WILLIAM RICHARD HILLIARD, JR.

did employ, use, persuade, induce, entice, and coerce Child Victim 5 to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was produced using materials that had been mailed, shipped, and transported in interstate and foreign commerce, and **WILLIAM RICHARD HILLIARD, JR.** knew such visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce, and knew and had reason to know that such visual depiction would be, and later was, transported by him in interstate commerce into the Western District of North Carolina, and did attempt to do so.

All in violation of Title 18, United States Code, Section 2251(a).

*The production of child pornography of Child Victim 5 on or about June 24, 2016,
at Myrtle Beach, South Carolina that HILLIARD transported back to
the Western District of North Carolina.*

COUNT SIXTEEN

On or about June 24, 2016, in Cleveland County, within the Western District of North Carolina and elsewhere,

WILLIAM RICHARD HILLIARD, JR.

did employ, use, persuade, induce, entice, and coerce Child Victim 5 to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was produced using materials that had been mailed, shipped, and transported in interstate and foreign commerce, and **WILLIAM RICHARD HILLIARD, JR.** knew such visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce, and knew and had reason to know that such visual depiction would be, and later was, transported by him in interstate commerce into the Western District of North Carolina, and did attempt to do so.

All in violation of Title 18, United States Code, Section 2251(a).

A separate production of child pornography of Child Victim 5 on or about June 24, 2016, at Myrtle Beach, South Carolina that HILLIARD transported back to the Western District of North Carolina.

COUNT SEVENTEEN

On or about June 24, 2016, in Cleveland County, within the Western District of North Carolina and elsewhere,

WILLIAM RICHARD HILLIARD, JR.

did employ, use, persuade, induce, entice, and coerce Child Victim 5 to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was produced using materials that had been mailed, shipped, and transported in interstate and foreign commerce, and **WILLIAM RICHARD HILLIARD, JR.** knew such visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce, and knew and had reason to know that such visual depiction would be, and later was, transported by him in interstate commerce into the Western District of North Carolina, and did attempt to do so.

All in violation of Title 18, United States Code, Section 2251(a).

The transportation of child pornography produced in Myrtle Beach, South Carolina of Child Victim 5 back to the Western District of North Carolina.

COUNT EIGHTEEN

On or about June 24, 2016, in Cleveland County, within the Western District of North Carolina and elsewhere,

WILLIAM RICHARD HILLIARD, JR.

knowingly transported and attempted to transport child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), using any means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce by any means, including by computer.

All in violation of Title 18, United States Code, Section 2252A(a)(1).

*The production of child pornography of Child Victim 7 on or about June 17, 2017,
at Myrtle Beach, South Carolina that HILLIARD transported back to
the Western District of North Carolina.*

COUNT NINETEEN

On or about June 17, 2017, in Cleveland County, within the Western District of North Carolina and elsewhere,

WILLIAM RICHARD HILLIARD, JR.

did employ, use, persuade, induce, entice, and coerce Child Victim 7 to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was produced using materials that had been mailed, shipped, and transported in interstate and foreign commerce, and **WILLIAM RICHARD HILLIARD, JR.** knew such visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce, and knew and had reason to know that such visual depiction would be, and later was, transported by him in interstate commerce into the Western District of North Carolina, and did attempt to do so.

All in violation of Title 18, United States Code, Section 2251(a).

The transportation of child pornography produced in Myrtle Beach, South Carolina of Child Victim 7 back to the Western District of North Carolina.

COUNT TWENTY

On or about June 17, 2017, in Cleveland County, within the Western District of North Carolina and elsewhere,

WILLIAM RICHARD HILLIARD, JR.

knowingly transported and attempted to transport child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), using any means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce by any means, including by computer.

All in violation of Title 18, United States Code, Section 2252A(a)(1).

Productions of child pornography within the Western District of North Carolina
on various occasions.

COUNTS TWENTY-ONE THROUGH THIRTY

In Avery, Cleveland, Gaston, and Watauga Counties, on the occasions described in the table below, within the Western District of North Carolina, and elsewhere,

WILLIAM RICHARD HILLIARD, JR.

did employ, use, persuade, induce, entice, and coerce a minor and minors to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was produced using materials that had been mailed, shipped, and transported in interstate and foreign commerce, and **WILLIAM RICHARD HILLIARD, JR.** knew such visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce, and did attempt to do so.

All in violation of Title 18, United States Code, Section 2251(a).

Count	On or About Date	Victim(s)	Location
TWENTY-ONE	August 30, 2012	Child Victim 3	404 Farris Drive, Cherryville, North Carolina, Gaston County

TWENTY-TWO	Between January 1, 2015 and August 1, 2015	Child Victim 5	404 Farris Drive, Cherryville, North Carolina, Gaston County
TWENTY-THREE	August 19, 2016	Child Victim 9	2742 Clineland Road, Cherryville, North Carolina, Cleveland County
TWENTY-FOUR	August 19, 2016	Child Victim 9	2742 Clineland Road, Cherryville, North Carolina, Cleveland County
TWENTY-FIVE	September 24, 2016	Child Victim 5	2742 Clineland Road, Cherryville, North Carolina, Cleveland County
TWENTY-SIX	June 29, 2017	Child Victim 1	2742 Clineland Road, Cherryville, North Carolina, Cleveland County
TWENTY-SEVEN	June 29, 2017	Child Victims 1 and 8	1360 East Marion Street, Shelby, North Carolina, Cleveland County
TWENTY-EIGHT	June 29, 2017	Child Victim 1	2742 Clineland Road, Cherryville, North Carolina, Cleveland County

TWENTY-NINE	December 10, 2017	Child Victims 2 and 8	2742 Clineland Road, Cherryville, North Carolina, Cleveland County
THIRTY	January 26, 2018	Child Victims 7 and 12	At a residence, unknown to the Grand Jury but somewhere in or near Beech Mountain in Watauga, Avery, and Cleveland Counties.

The defendant's travel to Myrtle Beach, South Carolina to produce child pornography of Child Victim 1 on or about May 17, 2018.

COUNT THIRTY-ONE

On or about May 17, 2018, in Cleveland County, within the Western District of North Carolina and elsewhere,

WILLIAM RICHARD HILLIARD, JR.

did knowingly travel and did attempt to travel in interstate commerce for the purpose of engaging in any illicit sexual conduct, as defined in Title 18, United States Code, Section 2423(f), with another person.

All in violation of Title 18, United States Code, Section 2423(b).

*The production of child pornography of Child Victim 1 on or about May 17, 2018,
at Myrtle Beach, South Carolina that HILLIARD transported or intended to
transport back to the Western District of North Carolina.*

COUNT THIRTY-TWO

On or about May 17, 2018, in Cleveland County within the Western District
of North Carolina and elsewhere,

WILLIAM RICHARD HILLIARD, JR.

did employ, use, persuade, induce, entice, and coerce Child Victim 1 to engage in
sexually explicit conduct for the purpose of producing a visual depiction of such
conduct, which visual depiction was produced using materials that had been mailed,
shipped, and transported in interstate and foreign commerce, and **WILLIAM
RICHARD HILLIARD, JR.** knew such visual depiction would be transported and
transmitted using any means and facility of interstate and foreign commerce, and
knew and had reason to know that such visual depiction would be, later was, and
was intended to be, transported by him in interstate commerce into the Western
District of North Carolina, and did attempt to do so.

All in violation of Title 18, United States Code, Section 2251(a).

The production of child pornography of Child Victim 1, on or about May 18, 2018, at Myrtle Beach, South Carolina that HILLIARD transported or intended to transport back to the Western District of North Carolina.

COUNT THIRTY-THREE

On or about May 18, 2018, in Cleveland County within the Western District of North Carolina and elsewhere,

WILLIAM RICHARD HILLIARD, JR.

did employ, use, persuade, induce, entice, and coerce Child Victim 1 to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was produced using materials that had been mailed, shipped, and transported in interstate and foreign commerce, and **WILLIAM RICHARD HILLIARD, JR.** knew such visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce, and knew and had reason to know that such visual depiction would be, later was, and was intended to be, transported by him in interstate commerce into the Western District of North Carolina, , and did attempt to do so.

All in violation of Title 18, United States Code, Section 2251(a).

*The production of child pornography of Child Victim 1 on or about May 19, 2018,
at Myrtle Beach, South Carolina that HILLIARD transported or intended to
transport back to the Western District of North Carolina.*

COUNT THIRTY-FOUR

On or about May 19, 2018, in Cleveland County within the Western District
of North Carolina and elsewhere,

WILLIAM RICHARD HILLIARD, JR.

did employ, use, persuade, induce, entice, and coerce Child Victim 1 to engage in
sexually explicit conduct for the purpose of producing a visual depiction of such
conduct, which visual depiction was produced using materials that had been mailed,
shipped, and transported in interstate and foreign commerce, and **WILLIAM
RICHARD HILLIARD, JR.** knew such visual depiction would be transported and
transmitted using any means and facility of interstate and foreign commerce, and
knew and had reason to know that such visual depiction would be, later was, and
was intended to be, transported by him in interstate commerce into the Western
District of North Carolina, , and did attempt to do so.

All in violation of Title 18, United States Code, Section 2251(a).

The transportation of child pornography produced in Myrtle Beach, South Carolina of Child Victim 1 back to the Western District of North Carolina.

COUNT THIRTY-FIVE

On or about May 19, 2018, in Cleveland County, within the Western District of North Carolina and elsewhere,

WILLIAM RICHARD HILLIARD, JR.

knowingly transported and attempted to transport child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), using any means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce by any means, including by computer.

All in violation of Title 18, United States Code, Section 2252A(a)(1).

The travel to Myrtle Beach, South Carolina, to produce child pornography of

Child Victims 9, 10, and 11 on or about June 9, 2018.

COUNT THIRTY-SIX

On or about June 9, 2018, in Cleveland County, within the Western District of North Carolina and elsewhere,

WILLIAM RICHARD HILLIARD, JR.

did knowingly travel and did attempt to travel in interstate commerce for the purpose of engaging in any illicit sexual conduct, as defined in Title 18, United States Code, Section 2423(f), with another person.

All in violation of Title 18, United States Code, Section 2423(b).

The transportation of child pornography to Myrtle Beach, South Carolina

on or about June 9, 2018.

COUNT THIRTY-SEVEN

On or about June 9, 2018, in Cleveland County, within the Western District of North Carolina and elsewhere,

WILLIAM RICHARD HILLIARD, JR.

knowingly transported and attempted to transport child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), using any means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce by any means, including by computer.

All in violation of Title 18, United States Code, Section 2252A(a)(1).

*The production of child pornography of Child Victim 9 on or about June 10, 2018,
at Myrtle Beach, South Carolina that HILLIARD intended to transport back to
the Western District of North Carolina.*

COUNT THIRTY-EIGHT

On or about June 10, 2018, in Cleveland County, within the Western District
of North Carolina and elsewhere,

WILLIAM RICHARD HILLIARD, JR.

did employ, use, persuade, induce, entice, and coerce Child Victim 9 to engage in
sexually explicit conduct for the purpose of producing a visual depiction of such
conduct, which visual depiction was produced using materials that had been mailed,
shipped, and transported in interstate and foreign commerce, and **WILLIAM
RICHARD HILLIARD, JR.** knew such visual depiction would be transported and
transmitted using any means and facility of interstate and foreign commerce, and
knew and had reason to know that such visual depiction would be, and was intended
to be, transported by him in interstate commerce into the Western District of North
Carolina, and did attempt to do so.

All in violation of Title 18, United States Code, Section 2251(a).

The production of child pornography of Child Victim 10 on or about June 10, 2018, at Myrtle Beach, South Carolina that HILLIARD intended to transport back to the Western District of North Carolina.

COUNT THIRTY-NINE

On or about June 10, 2018, in Cleveland County, within the Western District of North Carolina and elsewhere,

WILLIAM RICHARD HILLIARD, JR.

did employ, use, persuade, induce, entice, and coerce Child Victim 10 to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was produced using materials that had been mailed, shipped, and transported in interstate and foreign commerce, and **WILLIAM RICHARD HILLIARD, JR.** knew such visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce, and knew and had reason to know that such visual depiction would be, and was intended to be, transported by him in interstate commerce into the Western District of North Carolina, and did attempt to do so.

All in violation of Title 18, United States Code, Section 2251(a).

The production of child pornography of Child Victim 11 on or about June 10, 2018, at Myrtle Beach, South Carolina that HILLIARD intended to transport back to the Western District of North Carolina.

COUNT FORTY

On or about June 10, 2018, in Cleveland County, within the Western District of North Carolina and elsewhere,

WILLIAM RICHARD HILLIARD, JR.

did employ, use, persuade, induce, entice, and coerce Child Victim 11 to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was produced using materials that had been mailed, shipped, and transported in interstate and foreign commerce, and **WILLIAM RICHARD HILLIARD, JR.** knew such visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce, and knew and had reason to know that such visual depiction would be, and was intended to be, transported by him in interstate commerce into the Western District of North Carolina, and did attempt to do so.

All in violation of Title 18, United States Code, Section 2251(a).

*HILLIARD's receipt of child pornography at various times within
the Western District of North Carolina.*

COUNT FORTY-ONE

Beginning on a date unknown to the Grand Jury, but continuing through on or about June 12, 2018, in Cleveland and Gaston Counties, within the Western District of North Carolina and elsewhere,

WILLIAM RICHARD HILLIARD, JR.

knowingly received and attempted to receive, using any means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce by any means, including by computer, any child pornography, as defined in Title 18, United States Code, Section 2256(8)(A).

All in violation of Title 18, United States Code, Section 2252A(a)(2)(A).

*HILLIARD's possession of child pornography at various times within
the Western District of North Carolina.*

COUNT FORTY-TWO

Beginning on a date unknown to the Grand Jury, but continuing through on or about June 12, 2018, in Cleveland and Gaston Counties, within the Western District of North Carolina and elsewhere,

WILLIAM RICHARD HILLIARD, JR.

knowingly possessed and accessed with intent to view any material that contained an image of child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), that involved a prepubescent minor and a minor who had not attained 12 years of age, and that has been mailed, and shipped and transported using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means, including by computer, and that was produced using materials that have been mailed, and shipped and transported in and affecting interstate and foreign commerce by any means, including by computer.

All in violation of Title 18, United States Code, Section 2252A(a)(5)(B).

NOTICE OF FORFEITURE AND FINDING OF PROBABLE CAUSE

Notice is hereby given of 18 U.S.C. § 2253 and 21 U.S.C. § 853. The following property is subject to forfeiture in accordance with 18 U.S.C. § 2253 and 21 U.S.C. § 853:

- a. Any visual depiction or book, magazine, periodical, film, videotape, or other matter which contains any such depiction, which was produced, transported, mailed, shipped, or received during the violations set forth in this bill of indictment;
- b. Any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from proceeds of the violations;
- c. Any property, real or personal, used or intended to be used to commit or promote the violations; and
- d. If, as set forth in 21 U.S.C. § 853(p), any property described in (a), (b), or (c) cannot be located upon the exercise of due diligence, has been transferred or sold to, or deposited with, a third party, has been placed beyond the jurisdiction of the court, has been substantially diminished in value, or has been commingled with other property which cannot be divided without difficulty, all other property of the defendant/s to the extent of the value of the property described in (a), (b) and (c).

The Grand Jury finds probable cause that the following property that was seized on or about June 10, 2018, June 11, 2018, and June 12, 2018, during the course of the investigation of the offenses herein is subject to forfeiture on one or more of the grounds stated above:

1. Black SanDisk Ultra Plus 64GB.
2. Apple iPad.
3. Blue Sdhc 32gb.
4. SanDisk Ultra 16 GB SD Memory Card.
5. Gold Sandisk Extreme 128 GB SD Card.
6. Apple MacBook Air.
7. SanDisk Ultra 8 GB SD Memory Card (Pink/Purple Writing).
8. Apple iPad Air 2.
9. Samsung Full HD Camcorder.
10. Panasonic Lumix Digital camera.
11. Apple iPhone 4.
12. Apple iPhone X.

Name Redacted

A TRUE BILL: /

GRAND JURY FOREPERSON

R. ANDREW MURRAY
UNITED STATES ATTORNEY


DAVID A. THORNELOE
ASSISTANT UNITED STATES ATTORNEY